

ORIGINAL

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FILED

OCT 25 2007

RICHARD W. WIEKING
U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RONALD WILLIAMS,
BARRY LYNN SAMUEL,
a.k.a Samuel Jacques, a.k.a. Lynn,
a.k.a. Nephew,
JOSE JUAN PENALOZA-HILARIO,
a.k.a. Paisa, a.k.a. Chopa,
ELEAZAR MORA-ARCIGA,
a.k.a. Liach, a.k.a. Leacha, a.k.a.
Chaparrito, a.k.a. Chaparrillo,
a.k.a. Chaparro,
SALVADOR ORTEGA,
a.k.a. Funky, a.k.a. Chavita, a.k.a.
Primo,
CARLOS GUERRERO-ELENES,
a.k.a C Los,
MIGUEL RAMIREZ,

SAMUEL ARANDA,
RONALD LEE HINES,
CESAR RAMIREZ-CHAVIRA,

(Continued)

No. CR: 07-0645 MMC

UNITED STATES' MOTION TO
PARTIALLY UNSEAL INDICTMENT
AND [~~PROPOSED~~] ORDER

UNDER SEAL OF COURT

188

1 a.k.a. Cesar Chavea, a.k.a. Jose
2 Manzo,
3 ERIKA MANZO,
4 JAVIER ULISES ZAMORA-
5 HERNANDEZ,
6 a.k.a. Patron, a.k.a. Bulis, a.k.a.
7 Ulys, a.k.a. Ulyses,
8 [REDACTED],
9 MICHAEL JOSEPH SILVA,
10 a.k.a. Michael Silva,
11 [REDACTED],
12 EDWARD LEROY MOORE,
13 a.k.a. Eddie Mo,
14 JOSE ANTONIO CAMACHO-
15 MENDEZ,
16 [REDACTED],
17 [REDACTED],
18 [REDACTED],
19 [REDACTED],
20 [REDACTED],
21 [REDACTED],
22 [REDACTED],
23 [REDACTED],
24 [REDACTED],
25 [REDACTED],
26 [REDACTED],
27 [REDACTED],
28 [REDACTED],
Defendants.

(Continued)

18 The United States hereby moves the Court for an order partially unsealing, the
19 Indictment. The United States requests that the Indictment be only partially unsealed to reflect
20 the names of only the defendants who have been apprehended thus far for use in their initial
21 appearance before the Magistrate. The United States further requests that they be permitted to
22 redact the names of defendants who have not yet been apprehended. The United States believes
23 that disclosure of the entire Indictment may cause the subjects of the indictment who have not yet
24 been apprehended to flee, destroy evidence and/or make efforts to conceal on-going criminal

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1 activity, jeopardizing the progress of its on-going investigation and the arrest of the defendants.

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3 DATED: October 11, 2007

Respectfully submitted,

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5 SCOTT N. SCHOOLS
United States Attorney

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8 BARBARA SILANO
Assistant United States Attorney

ORDER

Based upon the motion of the government and for good cause shown, IT IS
HEREBY ORDERED that the Indictment shall be partially unsealed until further order of
the Court. IT IS FURTHER ORDERED THAT the United States may redact the names
of the defendants who have not yet been apprehended and provide a copy of the redacted
indictment to the apprehended defendants.

DATED: 10/24/07



HON. EDWARD M. CHEN
United States Magistrate Judge